

Suggested Talking Points  
EPA Draft FS  
August 2015

The LWG has received EPA's Draft Feasibility Study Sections 3 and 4. We will now carefully review the entire document and work to provide feedback to EPA over the months of August and September.

Background:

1. The LWG submitted our Draft Feasibility Study to EPA in March 2012. EPA told the LWG in December 2012 that our draft FS was a "substantial body of work" and can be used to "support EPA's evaluation of remedial Alternatives". EPA also noted our draft FS "provides a reasonable range of remedial action alternatives for the detailed and comparative evaluation of alternatives."
2. The LWG has several key considerations we will be looking for in EPA's Draft FS:
  - a. Cleanup goals should be achievable through sediment cleanup and source control
  - b. Risk management needs to be incorporated when setting cleanup goals
  - c. Each alternative should use a combination of technologies – dredging, capping, and monitored natural recovery
  - d. Mass removal of contaminated sediment should not be presumed to be more effective than other technologies in achieving risk reduction over time
  - e. The length of time and cost to achieve cleanup goals are important factors in evaluating combinations of technologies
  - f. Natural recovery is occurring and will help achieve cleanup goals over time.
  - g. Short term impacts associated with in-water cleanup (dredging or capping) should be evaluated
  - h. Estimated costs are proportional to effectiveness of cleanup options in reducing risk
  - i. Opportunities before and after remedy selection to incorporate new data, current and future uses of shoreline, and potential technical innovations to achieve cleanup goals
3. The LWG has spent nearly \$110 million in technical sampling, analysis and agency oversight and wants to see a timely, cost effective and health protective proposed cleanup plan put forward by EPA. Completion of the FS is the next step toward that goal.
4. The LWG remains committed to fulfilling the requirements of our Administrative Order on Consent to produce a Remedial Investigation/Feasibility Study that complies with the National Contingency Plan.